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January 16, 2001

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee

RE: Staff Data Request, Docket 00-00851

Dear Mr. Waddell:

Attached is BellSouth's response to the TRA Staff's Data Request, dated January 5, 2001.

As noted in its Motion for Partial Reconsideration, filed on December 27, 2000, although the Authority has not yet received a proper delegation of power from the FCC to implement number pooling as to the 615 NPA, BellSouth supports the preservation of numbering resources and has no overarching objection to the steps that the Authority has taken to fulfill that goal. BellSouth has taken a number of good faith steps to comply with the Authority's December 12, 2000 Order and filed its Motion for Reconsideration to request modification of the Authority's Order only with respect to BellSouth's implementation. BellSouth's Motion was based on several technical problems that existed prior to the Authority's September 26, 2000 decision. Had we had the opportunity we would have certainly advised the Authority of these problems prior to its decision. Further, BellSouth's Motion was based upon an analysis of the Authority's Pooling Administrator that found that granting BellSouth's requests should not affect the availability of numbering resources in the 615-NPA.

BellSouth has made a good faith effort to address the Staff's questions. However, several questions are unclear and appear confusing given our Motion and direct discussions with the Staff. Other questions do not seem to be relevant to BellSouth's Motion, particularly in light of the Pooling Administrator's analysis. Nonetheless, we have attempted to be responsive to these questions as we understood them. We realize that the technical details of number pooling and the activities required to implement number pooling are complex, and we are available to discuss and clarify any of these issues at the Staff's request. We are also working with one of our vendors, Lucent Technologies, to arrange the meeting requested by the Staff.

(2)

Finally, BellSouth has fully cooperated with the Authority and the industry during the recent past to analyze several alternatives for number conservation. BellSouth has never advised the Authority that number pooling could be implemented in the five months allotted by the Authority. We can only state that, had the Authority informed the industry of its intent to implement number pooling earlier, we could have initiated the good faith steps described in our earlier Motion and avoided the need to file such a Motion and these Data Requests.

Yours truly,

A handwritten signature in cursive script, reading "Charlie Howarth". The signature is written in dark ink on a white background.

Attachment

REQUEST: Provide a letter signed by an official from Telcordia indicating that April 9, 2001 is the earliest date that Telcordia can complete the conversion of BellSouth's 5ESS switches in the 615 NPA from COSMOS to SWITCH and the reasons why the March 1, 2001 implementation date cannot be met by Telcordia.

RESPONSE: This question appears to confuse separate issues described in BellSouth's Motion for Reconsideration. Telcordia is not involved in any "conversion of BellSouth's 5ESS switches", and no network switches, such as the 5ESS, are directly involved in the COSMOS-to-SWITCH conversion. Further, BellSouth cannot find any reference in its Motion for Reconsideration that would specifically identify Telcordia as the reason why the Authority's March 1, 2001 date cannot be met. Neither can BellSouth find any comments that it made during the October 27, 2000 industry meeting or a subsequent meeting on November 2, 2000 with the Staff to discuss number pooling that would indicate that Telcordia was the reason that the March 1, 2001 cannot be met by BellSouth.

BellSouth describes Telcordia's SWITCH software and the COSMOS-to-SWITCH conversion under Section I, pages 3 and 4, of its Motion for Reconsideration. This Motion describes BellSouth's good faith efforts to advance the conversion schedule, and the Motion clearly identifies hardware-related issues as a key limiting factor in completing the SWITCH conversion on April 9, 2001. This limiting item will be discussed further in the response to Item No. 3.

A description of the issues related to the 5ESS switch begins on page 4 of BellSouth's Motion with the paragraph beginning with "A separate problem. . ." (emphasis added). This issue is related to software upgrades for the 5ESS switch operating system provided by the switch vendor, Lucent Technologies. Again, this is a completely separate issue from the COSMOS-to-SWITCH conversion involving Telcordia.

With respect to both of these issues, BellSouth states that it had no opportunity to advise the TRA of these or other issues affecting its implementation of number pooling prior to the Authority's September 26, 2000 decision. Had BellSouth been informed earlier of the Authority's intention, we could have initiated negotiations with various vendors earlier and possibly advanced some schedules, avoiding some of the issues presented in BellSouth's Motion.

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REQUEST: BellSouth explains the delay in installing SWITCH is due to switch hardware that is on back-order from a vendor. Provide a description of the hardware, the location of and the type of switches affected by the lack of hardware, the name, address and telephone number of the vendor. Also provide a copy of any written communications BellSouth has had with the vendor over the hardware required for SWITCH including the original purchase order that shows the date the hardware was ordered.

RESPONSE: As indicated in the response to Item No. 1, BellSouth can find no statements in its Motion, comments that it made during the October 27, 2000 industry meeting or comments made during a subsequent meeting on November 2, 2000 with the Staff to discuss number pooling that would indicate that the deployment of Telcordia's SWITCH product involves individual switches in BellSouth's network.

The hardware mentioned on Page 4 of BellSouth's Motion (and presumably the subject of this question) is a Model DL580 NT server, manufactured by Compaq Computer Corporation.

As described in BellSouth's Motion (page 3), BellSouth had taken steps to advance the COSMOS-to-SWITCH schedule prior to the Authority's decision. Consistent with that advanced schedule, BellSouth authorized its vendor on September 23, 2000 to purchase 13 Compaq ML 530 NT servers for the COSMOS-to-SWITCH conversion, two of which to be used in Tennessee. Shortly after this authorization was issued, BellSouth determined that the ML 530 did not meet the revised hardware specifications for the SWITCH operating environment issued by Telcordia, and the authorization was suspended. Another Compaq product, the DL 580 NT server, did meet the revised specifications, and BellSouth began investigating the purchase of this product. During pre-order discussions on October 10, 2000, BellSouth learned that Compaq was currently requiring three months to meet current orders for the DL 580. Since this interval was unacceptable, BellSouth never placed orders for the DL 580. Instead, BellSouth began investigating other alternatives as described in the response to Item No. 3.

Copies of responsive documents, which contain BellSouth proprietary information, will be made available for inspection by the Staff as soon as possible.

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REQUEST: Regarding the hardware mentioned in question 2, has BellSouth attempted to purchase the hardware from another vendor? If the answer is yes, provide a list along with name and address of each vendor contacted and their response. If the answer is no, please explain why additional efforts were not made by BellSouth in light of the Authority's Pooling Order.

RESPONSE: BellSouth did not contact other hardware vendors. BellSouth has chosen Compaq as its only regional vendor for NT-related equipment. This decision limits the cost and training, documentation and other supporting items required to maintain BellSouth's NT environment. Introducing NT equipment from another vendor would be a complex and time-consuming undertaking and was not a viable alternative to meeting the Authority's Order.

Once BellSouth learned that the Compaq Model DL 580 was on back-order from the manufacturer, BellSouth requested Telcordia to review their revised hardware specifications. Subsequently, Telcordia determined that these specifications could be relaxed, and the Compaq Model ML 530 NT server would meet these relaxed specifications. A purchase order was issued to Compucom for seven Compaq Model ML 530 NT servers on November 6, 2000, and this equipment was shipped to BellSouth in December, 2000 on an expedited schedule.

(At the time BellSouth filed its Motion on December 27, 2000, we were unaware of the decision to order the Compaq Model ML530 NT server in lieu of the Model DL580 NT server that was on "back-order". This decision was made in an effort to speed up the process.)

REQUEST: At the First Implementation Meeting for Pooling held on October 27, 2000, BellSouth stated that SWITCH software had been delivered to BellSouth. What date was SWITCH delivered BellSouth? Explain the reason(s) for the delay in loading SWITCH into the twelve (12) BellSouth switches in the 615 NPA where there is no hardware deficiency?

RESPONSE: As stated before, BellSouth has made no indication that Telcordia's SWITCH software is loaded into any network switches, and the "hardware deficiency", (presumably referring to the NT server equipment) is information technology equipment, not equipment associated with network central office switches. Therefore, there has been no delay as described in this question.

The SWITCH product was delivered by Telcordia to BellSouth on September, 10, 1999. Following that delivery and for the protection of our customers, BellSouth installed the produce in a test environment and conducted extensive acceptance testing to ensure that all existing functionality of COSMOS was retained and that this new product could be introduced into BellSouth's existing operation environment. The acceptance testing and conversion preparation activities completed by the end of June, 2000.

In an attempt to be responsive and address the underlying question in this Item, BellSouth states that the conversion from COSMOS to SWITCH is a complex process that involves the following steps at each installation site:

- A. Installation and testing of a new information technology platform (i.e., information technology hardware such as host machines, servers, routers, etc.) at each deployment location; This phase involves hardware installation and testing by the equipment vendor, software loading and testing by another vendor, and client acceptance testing by BellSouth personnel;
- B. Installation and testing of the SWITCH product itself on to this new platform;
- C. Creation of a new database via extraction from the existing COSMOS database;
- D. Extensive verification and testing of the new database, including audits and resolution of any database errors detected during this process; and
- E. Operational monitoring and resolution of post-conversion problems.

BellSouth and Telcordia have formed a joint team consisting of individuals with specialized training to implement the COSMOS-to-SWITCH conversion at multiple locations in the BellSouth region. The joint team has been trained to implement this entire conversion process that has been carefully designed to ensure a seamless conversion, transparent to BellSouth's customers, and with no interruptions in BellSouth's ability to provide quality service to all of its customers. Attempts to compress the conversion schedule or add additional untrained personnel to the joint team or utilize a new, different vendor will be counterproductive and introduce an unacceptable risk of creating severe service affecting problems

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REQUEST: In Exhibit D to BellSouth's instant Petition, John Thorson of Siemens states that LNP Number Pooling feature is available on its DCO switching platform. Please provide a letter from Siemens further explaining why the Siemens DCO switch in Charlotte and White Bluff cannot support number pooling using the LNP Number Pooling feature that is available from Siemens. This letter should explain the difference between LNP Number Pooling and the optional LNP Number Pooling feature, which is scheduled to be released in November 2001.

RESPONSE: BellSouth believes that the e-mail from Mr. Thorson (Exhibit D to BellSouth's Motion) speaks for itself. A clear reading of this e-mail reveals that Mr. Thorson is referring to availability of a single number pooling feature with targeted availability in the Release 23 software package in the November, 2001 time frame. As further clarification, we have attached a second letter from Mr. Thorson. This letter clearly identifies that the Local Number Portability feature, which is currently available on the Siemens DCO switch, is being enhanced to provide number pooling capability. This enhanced feature is scheduled to be available in the November, 2001 time frame.

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SIEMENS

MEMORANDUM

Date: January 11, 2001

To: Mr. Bernard Sparks, BellSouth

From: John Thorson, Siemens SCN

Local Number Portability (LNP), feature number 003180, was available on the Siemens DCO switch part of our Release 20 offering in 1998. The DCO Local Number Portability feature offers Local Service Provider Portability (LSPP), which allows a subscriber to change from one local service provider to another local service provider without a directory number change.

This original LNP feature functionality is being enhanced to provide thousand block number 'pooling' with our Release 23 product offering, scheduled for General Availability in the November 2001 time frame. Our feature number for LNP Number Pooling is 003183.

Please contact me at (407) 942-5345 if you have any questions.

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REQUEST: Provide the number of assigned number groups (thousand-blocks) and NPA/NXX combinations in the Nashville Inglewood and Memphis Westwood 1AESS switches mentioned in the BellSouth instant petition. In each of the assigned number groups, provide a count of the numbers currently assigned (i.e. 778 of 1,000).

RESPONSE: In the Nashville Inglewood switch, there are currently eight NPA-NXX combinations assigned with 62 assigned number groups. The Block Donation Report for Inglewood identified four contaminated blocks and four non-contaminated blocks within the 615-228 NPA.

In the Memphis Westwood 1AESS switch, there are currently four NPA-NXX codes assigned and 40 assigned number groups. The Block Forecast and Block Donation Reports for Westwood are not currently available but will be developed according to the schedule set by the Pooling Administrator for the 901 NPA.

Please see the attachments for lists of assigned number groups in the Nashville Inglewood and Memphis Westwood 1AESS switches.

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NASHVILLE INGLEWOOD 1AESS SWITCH

NPA	NXX	NUMBERS	
		K-BLOCK	ASSIGNED
615	226	0	832
615	226	1	800
615	226	2	781
615	226	3	784
615	226	4	803
615	226	5	786
615	226	6	801
615	226	7	777
615	226	8	779
615	226	9	783
615	227	0	833
615	227	1	843
615	227	2	827
615	227	3	820
615	227	4	837
615	227	5	819
615	227	6	824
615	227	7	798
615	227	8	792
615	227	9	806
615	228	0	819
615	228	1	825
615	228	2	839
615	228	3	807
615	228	4	806
615	228	5	816
615	228	6	828
615	228	7	826
615	228	8	814
615	228	9	771

NASHVILLE INGLEWOOD 1AESS SWITCH cont.

NPA	NXX	NUMBERS	
		K-BLOCK	ASSIGNED
615	258	0	21
615	258	1	20
615	258	2	386
615	258	3	454
615	258	4	2
615	258	5	0
615	258	6	0
615	258	7	0
615	258	8	0
615	258	9	1
615	262	0	832
615	262	1	835
615	262	2	828
615	262	3	810
615	262	4	798
615	262	5	829
615	262	6	934
615	262	7	754
615	262	8	938
615	262	9	793
615	650	0	745
615	650	1	721
615	650	2	677
615	650	3	734
615	650	4	214
615	650	5	349
615	650	6	289
615	650	7	545
615	650	8	622
615	650	9	727

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NASHVILLE INGLEWOOD 1AESS SWITCH cont.

NPA	NXX	NUMBERS	
		K-BLOCK	ASSIGNED
615	369	1	*
615	760	9	*

These NPA-NXX codes were assigned in the Nashville Inglewood 1AESS as a result of customers porting local numbers into this switch under permanent local number portability. The number of current assignments is unknown, but only specific ported numbers are assigned, i.e., other numbers in these number blocks are not available for assignment in Inglewood.

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MEMPHIS WESTWOOD 1AESS SWITCH

NPA	NXX	NUMBERS K-BLOCK ASSIGNED
901	785	0 820
901	785	1 783
901	785	2 819
901	785	3 782
901	785	4 810
901	785	5 779
901	785	6 808
901	785	7 808
901	785	8 793
901	785	9 776
901	786	0 713
901	786	1 655
901	786	2 20
901	786	3 0
901	786	4 0
901	786	5 421
901	786	6 0
901	786	7 0
901	786	8 0
901	786	9 256

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MEMPHIS WESTWOOD 1AESS SWITCH

NPA	NXX	K-BLOCK	NUMBERS ASSIGNED
901	789	0	839
901	789	1	790
901	789	2	760
901	789	3	802
901	789	4	774
901	789	5	776
901	789	6	751
901	789	7	756
901	789	8	1000
901	789	9	730
662	781	0	708
662	781	1	685
662	781	2	630
662	781	3	625
662	781	4	388
662	781	5	192
662	781	6	1000
662	781	7	186
662	781	8	244
662	781	9	571

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REQUEST: Has BellSouth experienced trouble with implementing pooling in any of its other 1AESS switches located in other BellSouth state? If so, what resolution was ordered or agreed to by the state public service commission?

RESPONSE: BellSouth has not yet implemented thousand-block number pooling in any of its 1AESS switches located in any other BellSouth's states.

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REQUEST: Has BellSouth agreed to include any of its 1AESS switches located in other states in pooling trials? If so, what states and under what conditions?

RESPONSE: The only other state in BellSouth's region to order number pooling is Florida. BellSouth filed a request with the Florida Public Service Commission to exempt ten of its 1AESS switches located in areas where number pooling trials were ordered. On January 8, 2000, the Florida Commission denied BellSouth's request and ordered BellSouth to include the 1AESS switches in number pooling, using a approach developed by NeuStar, the pooling administrator for the Florida trials. A copy of the Florida Order is attached.

Although the Florida PSC has denied BellSouth's request, we continue to believe that this decision is not in the public interest and the Tennessee Regulatory Authority should exempt the two 1AESS switches in Tennessee for the following reasons:

1. Lucent Technologies has not agreed to provide vendor support for the approach developed by NeuStar; therefore, in the event of problems, no switch vendor support will be available and service affecting conditions that could result in service problems for customers;
2. NeuStar's approach involves donating blocks from the 1AESS switches, but then reserving them in case blocks are required by these same switches; this approach has little real effect on number resources; and,
3. The Tennessee Number Pooling Administrator has analyzed the effect of exempting the Nashville Inglewood 1AESS switch and determined that this exemption will have little or no effect on number resources available to the Nashville Rate Center.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Number Utilization Study: Investigation into Number Conservation Measures.	DOCKET NO. 981444-TP ORDER NO. PSC-01-0051-PAA-TP ISSUED: January 8, 2001
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The following Commissioners participated in the disposition of this matter:

J. TERRY DEASON, Chairman
E. LEON JACOBS, JR.
LILA A. JABER
BRAULIO L. BAEZ

ORDER DENYING VARIANCE OF NUMBER POOLING REQUIREMENT

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

Background

The Federal Communications Commission (FCC) issued Order No. FCC 99-249 granting our April 2, 1999, Petition for Delegation of Additional Authority to Implement Number Conservation Measures. In its Order, the FCC granted us interim authority to:

- (1) Institute thousands-block pooling by all local number portability (LNP)-capable carriers in Florida;
- (2) Reclaim unused and reserved NXX codes;
- (3) Maintain rationing procedures for six months following area code relief;
- (4) Set numbering allocation standards;
- (5) Request number utilization data from all carriers;
- (6) Implement NXX code sharing; and

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FPSC-RECORDS/REPORTING

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(7) Implement rate center consolidation.

By Order PSC-00-0543-PAA-TP, issued March 16, 2000, we approved the implementation of thousands-block number pooling for wireline carriers in the 954, 561, and 904 area codes, beginning May 1, July 1, and October 1, 2000, respectively. In addition, we established criteria for obtaining initial numbering resources, approved mandatory thousands-block number management procedures, and instituted a process to verify and reconcile numbering resource data available from different sources, all of which are equally applicable to wireline and wireless carriers.

On April 6, 2000, a protest of Order No. PSC-00-0543-PAA-TP (PAA Order) was filed by a number of parties¹ (Joint Petitioners). Specifically, the Joint Petitioners protested and sought a hearing regarding only the portions of the PAA Order that related to: (1) mandatory implementation of thousands-block pooling; (2) thousands-block pooling software release and implementation dates; and (3) designation of a pooling administrator. In addition, on April 6, 2000, Ms. Peggy Arvanitas filed comments responding to the informal Florida NXX Code Holders Group's plan and protested a portion of the PAA Order. The remaining portions of the PAA Order were not protested by the Joint Petitioners and were deemed stipulated pursuant to Section 120.80(13)(b), Florida Statutes.

On April 11, 2000, the Joint Petitioners filed an Offer of Settlement to Resolve the Number Pooling Implementation Protest of the PAA Order. The Offer of Settlement addressed many of the same issues set forth in the Florida NXX Code Holders Group's Number Pooling Implementation Plan for the 954, 561, and 904 NPAs.

On May 30, 2000, proposed agency action Order No. PSC-00-1046-PAA-TP, was issued approving the offer of settlement and dismissing the protest of Ms. Arvanitas. On June 20, 2000, Ms. Arvanitas filed Peggy Arvanitas's Motion for Reconsideration of Order No.

¹ALLTEL Communications, Inc.; AT&T Communications of the Southern States, Inc.; AT&T Wireless Services, Inc.; BellSouth Mobility, Inc.; BellSouth Telecommunications, Inc.; Florida Cable Telecommunications Association; Global NAPs, Inc.; GTE Service Corporation; Intermedia Communications; MCI WorldCom, Inc.; Media One Communications; Florida Telecom, Inc.; Sprint Spectrum Ltd., d/b/a Sprint PCS; Sprint Communications Company Ltd Partnership; Sprint-Florida, Inc.; Time Warner Telecom of Florida, L.P.; Trivergent Communications, Inc.

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PSC-00-1046-PAA-TP. On July 3, 2000, AT&T Communications of the Southern States, Inc., AT&T Wireless Services, Inc. (AT&T), and MCI WorldCom, Inc. (WorldCom) filed their Response to Motion for Reconsideration. On July 7, 2000, BellSouth Telecommunications, Inc. (BellSouth) filed its Response to the Motion for Reconsideration of Ms. Arvanitas. On July 7, 2000, Sprint-Florida Incorporated, Sprint Communications Company Limited Partnership, and Sprint PCS (collectively Sprint) filed their concurrence in AT&T and MCIWorldCom's Response.

By Order No. PSC-00-1527-FOF-TP, we denied Ms. Arvanitas's Motion requesting reconsideration of the issues contained in the final agency action portion of Order No. PSC-00-1046-PAA-TP. Thus, Commission Order No. PSC-00-1046-PAA-TP has become final and effective.

On July 28, 2000, BellSouth filed a Motion for Variance of the number pooling requirement for its 1AESS switches. On August 10, 2000, Ms. Arvanitas filed a Motion to Protest BellSouth's request for variance of number pooling implementation. On August 21, 2000, BellSouth filed its Response to Ms. Arvanitas' Motion to Protest.

Variance

Currently, BellSouth has 19 1AESS switches in Florida of which ten are located in the 561, 954, and 904 area codes where we instituted number pooling trials. BellSouth became aware that Lucent Technologies would only continue supporting the 1AESS switches until the fourth quarter of 2003, and would not provide any software upgrades at this time unless required by the FCC. BellSouth's motion requests that we grant it a variance from Order No. PSC-00-1046-PAA-TP for technical reasons until the existing 1AESS switches are replaced.

Ms. Arvanitas claims that if an LNP carrier is excluded from the pooling trials, this situation would not be competitively neutral, according to the Telecommunications Act. Ms. Arvanitas also states that there will not be any technical support for Lucent's 1AESS switches after 2003. She indicates that this situation should not keep BellSouth from upgrading its switches and asks that we deny BellSouth's request for variance from the number pooling requirement for its 1AESS switches.

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On August 21, 2000, BellSouth filed its Response to Ms. Arvanitas' Motion to Protest, stating that Ms. Arvanitas' assertions are irrelevant and incorrect.

Upon review of BellSouth's motion, our staff determined that additional information would be needed to fully analyze BellSouth's motion. Therefore, additional information was requested from BellSouth by letters dated August 8, 2000 and September 25, 2000. Our staff also contacted the Number Pooling Administrator (PA), NeuStar, to determine if it had any experience with carriers who experienced technical difficulties while participating in a pooling trial.

In an October 30, 2000 e-mail, the PA stated that it provided exceptions² to the Industry Numbering Committee (INC) thousand-blocks Guidelines in both Midwest and Northeast regions. The exceptions allow carriers with certain technical limitations such as the 1AESS switches have, to participate in the number pooling trials. The PA also provided our staff with the following steps which would enable pooling to be initiated within 1AESS switches:

1. Initially accept thousand-block donations from a carrier with limitations.
2. Internal to the PA, separately track the donated blocks from the carrier with limitations.
3. Assess the pools taking into account the forecasts and donations from the carrier with limitations.
4. After assessing the pools and taking into account the forecasts and donations from the affected carrier, make the excess blocks (above what has been forecasted, if any, from the carrier with limitations) available for assignment to the other participating carriers.

²INC thousand-block guidelines state that in a pooling environment, all LNP carriers would participate in a pooling trial and receive numbers in blocks of 1,000.

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5. When the carrier with limitations requests a block, a block from the original donation will be assigned (if available).
6. When the carrier with limitations requests a block and no block is available, the PA will request a new CO Code, asking this carrier to be the code holder.
 - a) The carrier with limitation will then be assigned a code (if available).
 - b) The carrier will retain the number of blocks requested.
 - c) The carrier will also donate the remaining blocks to the pool.

The PA has found this procedure to be a workable solution in areas where a carrier has certain limitations, such as the 1AESS switches. The PA agreed to provide this service, at no additional fee, for carriers in Florida that need to participate in pooling.

On November 6, 2000, our staff met with representatives of Lucent Technologies and BellSouth. Other industry members, representatives of NeuStar, and Ms. Arvanitas participated via conference call. Staff discussed the issues raised in BellSouth's motion. The PA explained the procedures (outlined above) as to how carriers with technical difficulties such as the 1AESS switches could participate in the number pooling trials.

It was clear in the discussions with Lucent Technologies representatives that number pooling with the 1AESS switches has two limitations which must be considered. These two limitations relate to number groups and NPA/NXX combinations. As presented by Lucent representatives, once a 1AESS switch has at least 127 assigned number groups (thousand-blocks) or 32 NPA/NXX combinations (whichever occurs first), the 1AESS switch will be technically at its capacity, and therefore unable to continue number pooling because the switch needs to be replaced.

After receiving the new information from the PA, BellSouth acknowledged that number pooling with the 1AESS switches is

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technically feasible using the procedures outlined by the PA, provided that some provision is made to address the 1AESS switches that have reached capacity limitations.

Based upon the foregoing, we find it reasonable to deny BellSouth's Motion for Variance because number pooling is viable using the 1AESS switches, as long as the PA agrees to allow an exception to the INC Thousand-block Guidelines by applying the procedures outlined above. We recognize that the 1AESS switches have capacity limitations as indicated by Lucent Technologies. We believe that for BellSouth to participate fully in a number pooling trial, a transition period must be allowed for replacement of the switch prior to reaching maximum capacity. Therefore, we find that once a 1AESS switch has at least 100 assigned number groups or 25 NPA/NXX combinations (whichever occurs first), BellSouth's 1AESS switches should be exempt from the pooling requirement.

BellSouth shall initiate number pooling in its 1AESS switches using the procedures outlined by the PA, with the understanding that once a 1AESS switch has at least 100 assigned number groups or 25 NPA/NXX combinations (whichever occurs first), the switch shall be exempt from the pooling requirement. This provides BellSouth with the ability to comply with Order No. PSC-00-1046-PAA-TP. Once the switch is replaced, BellSouth should follow the normal pooling procedures³ required of all other switches.

Based on the foregoing, it is

ORDERED by the Florida Public Service Commission BellSouth Telecommunications, Inc.'s Motion for Variance of Number Pooling Requirement for its 1AESS Switches is denied. It is further

ORDERED that BellSouth Telecommunications, Inc. initiate number pooling in its 1AESS switches consistent with a procedure established by NeuStar, as outlined in the body of this Order, with the caveat that once an 1AESS switch has at least 100 assigned number groups or 25 NPA/NXX combinations (whichever occurs first),

³Industry Numbering Committee (INC) Thousand-block number pooling guidelines.

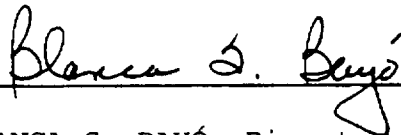
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BellSouth Telecommunications Inc.'s 1AESS switches should be exempt from the pooling requirement. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, this docket shall remain open.

By ORDER of the Florida Public Service Commission this 8th day of January, 2001.



BLANCA S. BAYÓ, Director
Division of Records and Reporting

(S E A L)

DWC

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

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Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of Records and Reporting, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on January 29, 2001.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this docket before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

BellSouth Telecommunications, Inc.
TRA Docket 00-00851
Staff's Data Request RE: BellSouth's Motion
For Partial Reconsideration
Dated: January 5, 2001
Response Filed: January 16, 2001
Item No. 9
Page 1 of 1

REQUEST: If BellSouth's instant motion is adopted regarding the 1AESS switches, describe the numbering resource requirements for a CLEC that wishes to serve all the rate centers in Davidson County? For example, will the CLEC be able to receive a 1,000 number block from the Pooling Administrator to serve Inglewood or will it have to request from NANPA a new NXX of 10,000 numbers to serve one customer in Inglewood? Is the answer the same for the Memphis Westwood exchange? Please explain.

RESPONSE: A CLEC will not be required to obtain a new NXX of 10,000 numbers to serve customers located within BellSouth's Nashville Inglewood wire center. CLECs are generally free to define their service areas without reference to BellSouth's wire centers. The Nashville Inglewood 1AESS serves an area within the Nashville Exchange and the Nashville Rate Center defined as the Nashville Inglewood wire center. BellSouth's customers located within the Inglewood wire center are also within the Nashville Rate Center. Since NXX codes will be assigned on a rate center basis, a CLEC will use NXX codes assigned within the Nashville Rate Center to serve any customer located within that Rate Center. The same explanation applies to the Memphis Westwood 1AESS.

Notwithstanding this hypothetical question, the Pooling Administrator has already examined the impact of BellSouth's request to exempt the Nashville Inglewood 1AESS from number pooling. Based upon actual block donation reports and forecast reports submitted by all service providers, the Pooling Administrator found that granting BellSouth's request would produce no adverse effect on number resources in the Nashville Rate Center. BellSouth will request a similar analysis on its request to exempt the Memphis Westwood 1AESS in the 901 NPA during the industry meeting tentatively scheduled for February, 2001.

BellSouth Telecommunications, Inc.
TRA Docket 00-00851
Staff's Data Request RE: BellSouth's Motion
For Partial Reconsideration
Dated: January 5, 2001
Response Filed: January 16, 2001
Item No. 10
Page 1 of 1

REQUEST: Do BellSouth customers served by Nashville Inglewood and Memphis Westwood switches encounter service/feature limitations compared to other BellSouth customers served by more modern switches? Please explain what limitations, if any.

RESPONSE: This question is not relevant to BellSouth's request to exempt the 1AESS switch from number pooling. However, in an attempt to be responsive, BellSouth states that the 1AESS switch provides customers with services and features similar both in kind and in quality to other services and features provided by other switches currently in use in BellSouth's network. Specific limitations of the 1AESS switch generally involved services involving a digital loop facility, such as Basic Rate and Primary Rate ISDN Service, and similar services offered as part of BellSouth's Centrex service offering. However, BellSouth has developed an Alternate Network Serving Arrangement (ANSA) that provides customers with Basic or Primary Rate ISDN service from another network switch upon request and at no additional charge to the customer. The ANSA has been in use for a number of years and is included in BellSouth's tariffs for these services. Therefore, there is no material difference in services and/or features provided by BellSouth to customers served by a 1AESS switch compared to those served by another type of switch.